



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 25 2014

CERTIFIED MAIL 7012 1010 0002 0759 6113
RETURN RECEIPT REQUESTED

The Honorable Percy Bland
Mayor of Meridian
601 23rd Avenue
Meridian, Mississippi 39302

Re: Approval of Extension to Respond to the May 6, 2014 Information Request and Request for Supplemental Information Pursuant to Section 308 of the Clean Water Act National Pollutant Discharge Elimination System Permit Nos.: MS0020117 and MS0055735 Meridian South Publically Owned Treatment Works and Meridian East Publically Owned Treatment Works

Dear Mayor Bland:

Based on conversations held on June 5, 2014, and June 18, 2014, between the U.S. Environmental Protection Agency Region 4, the City of Meridian (the City) and the Mississippi Department of Environmental Quality (MDEQ), the EPA hereby agrees to extend the deadline for the City's submittal of a response to the EPA's May 6, 2014, Information Request (IR) issued pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318, from June 11, 2014, to July 11, 2014.

The EPA deems the sanitary sewer overflow (SSO) list submitted electronically by the City's legal counsel Michael Goggans, on June 17, 2014, in response to Question 3 in the IR to be incomplete because, in part, it does not contain a complete list of SSOs reported to MDEQ during September 2008 to May 6, 2014, and SSOs observed by the EPA during its April 2014 Compliance Evaluation Inspection. As stated in the IR, SSO is defined as an overflow, spill, release or diversion of wastewater from the sanitary sewer system. SSOs include overflows or releases of wastewater that reach waters of the U.S.; overflows or releases of wastewater that do not reach waters of the U.S.; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not an SSO. The City's response to Question 3 is required to include, in part, all SSOs as defined by the above definition for the time period of September 2008 to May 6, 2014. No response has been provided by the City to date for any of the additional questions contained in the IR.

In addition to providing a complete response to the EPA's IR, the EPA also requests additional information detailed below:

1. Please provide a description of the proposed pump station project to divert flow from the City's sewer to the East Wastewater Treatment Plant (WWTP), including anticipated commencement and completion dates, drawings, costs to install the pump station and sewer pipes, pump capacity and any operating plans for the pump station, including how it will be operated to divert flow during wet weather.
2. Please provide flow monitoring data relating to the pump station design to divert flow to the East WWTP.
3. Please provide a list of any currently proposed or contractor requested sewer expansion projects, including dates of anticipated commencement and completion of such projects and estimated costs for such projects.
4. Please provide a list of any currently proposed or planned pump station projects (such as additions, rehabilitation and/or repair) other than the proposed pump station project to divert flow to the East WWTP, including dates of anticipated commencement and completion of such projects and estimated costs for such projects.
5. Please provide a narrative description relating to the Phase 1 and Phase 2 South WWTP rehabilitation projects discussed by the City's representatives during the June 18, 2014, teleconference, including, but not limited to, narrative project descriptions, dates of anticipated commencement and completion of such projects and any cost estimates for each such project.
6. Please provide a copy of the 2007 sewer assessment/sewer survey report/documents discussed during the June 5, 2014, teleconference.
7. Please provide the most recent National Pollutant Discharge Elimination System permit application submitted to MDEQ regarding the consolidation of the East and South WWTPs.
8. Please provide a narrative description discussing the actions taken or to be taken by the City to address the effluent limit exceedances contained in Enclosure B to the EPA's May 6, 2014, correspondence, including, but not limited, to a timeline for implementation and completion of each such action and cost estimates broken down for each of the actions to be taken.
9. If not previously provided in response to the above questions, please provide a narrative description of actions taken or to be taken to address each of the concerns contained in the EPA's Inspection Report dated April 18, 2014, including, but not limited to, a timeline for implementation and completion of each such action and cost estimates broken down for each of the actions to be taken.
10. For any SSOs included on the SSO list provided to the EPA by the City on June 17, 2014, which have not been reported to MDEQ, please provide an explanation for why each such SSO has not been reported to MDEQ.

The City is required to respond to the May 6, 2014 Information Request and this Supplemental Information Request on or before July 11, 2014. The response should be directed to:

Ms. Sara Schiff, Enforcement Officer
U.S. Environmental Protection Agency, Region 4
Clean Water Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The City's response to both the IR and this Supplemental Information Request should specifically reference the particular Information Request, including the section and number of the Information Request and should be organized for the purpose of clarity. Additionally, all information submitted in response thereto must be accompanied by the following certification signed by a responsible City official in accordance with 40 C.F.R. § 122.22:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Failure to completely comply with both the IR and this Supplemental Information Request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

The City shall preserve, until further notice, all records (either written or electronic) which exist at the time of receipt of the IR that relate to any of the matters set forth in that Information Request or this Supplemental Information Request. The term "records" shall be interpreted in the broadest sense to include information of every sort. The response to this Information Request shall include assurance that these record protection provisions were put in place as required. No such records shall be disposed of until written authorization is received from the Chief of the Clean Water Enforcement Branch at the U.S. EPA, Region 4.

Please feel free to contact Ms. Schiff at (404) 562-9870 or by email at schiff.sara@epa.gov, if you have questions regarding either the IR or this Supplemental Information Request. Legal inquiries should be directed to Ms. Tanya Floyd, Associate Regional Counsel at (404) 562-9813 or by email at floyd.tanya@epa.gov.

Sincerely,



Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosure

cc: Mr. Michael Goggans
Counsel for City of Meridian

Mr. Hugh Smith
City of Meridian

Mr. Chris Sanders
Mississippi Department of Environmental Quality

Mr. Les Herrington
Mississippi Department of Environmental Quality